

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	Criminal No. 11-10212-JLT
)	
1. JOHN WILLIS)	
a/k/a "Bac Guai John")	
2. BRANT WELTY)	
3. PETER MELENDEZ)	
a/k/a "Shrek")	
4. AIBUN ENG)	
5. BRIAN BOWES)	
6. KEVIN BARANOWSKI)	
7. MICHAEL CLEMENTE)	
a/k/a "Ricky Martin")	
9. MARK THOMPSON)	
12. BRIDGET WELTY)	
)	
Defendants.)	

JOINT STATUS REPORT

Pursuant to Local Rule 116.5(A), the United States of America and the undersigned defendants submit this joint status report in advance of the Interim Status Conference scheduled for April 25, 2011.

1. Additional Discovery

The government is substantially up to date in its production of discovery. The government has produced information relating to newly-cooperating defendants as such information becomes available and anticipates continuing to produce new discovery on a rolling basis.

The defendants reserve the right to file for additional discovery in response to the government's productions.

2. Discovery Motions

On October 25, 2011, the Court had scheduled this hearing for the consideration of any discovery motions filed by the parties. No parties have filed discovery motions.

3. Expert Discovery

The Court previously adopted the parties' proposed schedule for discovery of experts: the government will produce the laboratory backup and qualifications of its expert witnesses, and any other expert disclosures, not less than 21 days before trial.

4. Speedy Trial Act Calculations

On October 31, 2011, the Court issued an Order excluding time from the October 25, 2011, the date of the last interim status conference, through April 25, 2012, the date of the next interim status conference. Accordingly, zero days have been counted and 70 days remain under the Speedy Trial Act.

5. Anticipated Trial

The parties believe that it is still too early to determine whether a trial in this matter will be required. Several defendants have already pleaded guilty and eight defendants remain (with one fugitive). The government is also continuing to investigate additional charges, including money laundering, and hopes to resolve its ongoing investigation before the date of the final status conference. The United States estimates that, as the case is currently constituted, a trial would last three to four weeks.

6. Final Status Conference

The Court previously scheduled the final status conference for May 24, 2012 at 11:30 a.m.

Respectfully submitted,

AIBUN ENG

By: Neil F. Faigel
Neil F. Faigel
Counsel for Aibun Eng

MARK THOMPSON

By: Samuel B. Goldberg
Samuel B. Goldberg
Counsel for Mark Thompson

Dated: April 24, 2012

CARMEN M. ORTIZ
UNITED STATES ATTORNEY

By: Timothy E. Moran
Timothy E. Moran
Richard L. Hoffman
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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Timothy E. Moran
Timothy E. Moran